

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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In Re: New York City Policing During Summer 2020
Demonstrations

Index ##:

20cv8924(CM)(GWG)
20cv10291(CM)(GWG)
20cv10541(CM)(GWG)
21cv322(CM)(GWG)
21cv533(CM)(GWG)
21cv1904(CM)(GWG)

This filing relates to: all cases.

X


STIPULATION

This matter coming to be heard by agreement of the parties, the Parties hereby stipulate and agree:

1. The defendants in the above captioned cases will turn over its video production to the Plaintiffs without any confidentiality designation; and
2. The plaintiffs will not publicly file or publish the video for two months from the date of this stipulation; and
3. The plaintiffs will not disclose in any other way, such as speaking or writing about, what is in the disclosed footage for two months from the date of this stipulation except, counsel may disclose footage in a submission to, or during a conference with, the Court; and
4. Within two months of the date of this stipulation, the defense can continue to review all of the video, and if it identifies a portion of any video that should be redacted, the defense can then designate that particular video as confidential and produce the same video with the redaction to the plaintiff; and
5. If plaintiff disagrees with the confidentiality designation, it can follow the process set out in the protective order (See Docket) to object to the confidentiality designation.

Dated: May 10, 2021
New York, NY

NYC CITY LAW DEPARTMENT



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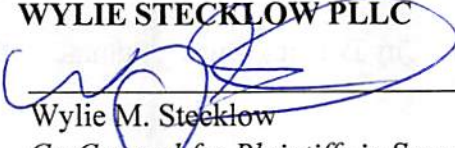
THE LEGAL AID SOCIETY

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SO ORDERED & ENTERED:

Hon. Chief Judge Gabriel G. Gorenstein